

COUNTY OF SUFFOLK



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SUFFOLK COUNTY EXECUTIVE

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DEPARTMENT OF LAW

January 11, 2021

Hon. A. Kathleen Tomlinson, U.S.M.J.  
United States District Court, Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, New York 11722

Re: McCune v. County of Suffolk  
CV14-4431(JS)(GRB)

Dear Judge Tomlinson:

The Suffolk County Attorney's Office represents defendants in this § 1983 action.

At the request of counsel for plaintiff, we respectfully ask that the Court extend the discovery schedule for an additional 45 days to March 1, 2021.

This extension is requested to permit plaintiff time to depose defendants Kurklen and Vohs, as well as non-party police officers Hendricksen, Rafferty and (if he can be located in retirement) Termine.

We thank the Court in advance for its anticipated consideration of this request.

Respectfully submitted,

Dennis M. Cohen  
Suffolk County Attorney

By: /s/ Arlene S. Zwilling  
Arlene S. Zwilling  
Assistant County Attorney